

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ContentGuard Holdings, Inc.,

Plaintiff,

v.

Amazon.com, Inc. et al.,

Defendants.

CIVIL ACTION NO. 2:13-cv-1112-JRG
Jury Trial Demanded

**NOTICE OF SUPPLEMENTAL AUTHORITY IN SUPPORT OF DEFENDANTS’
RENEWED MOTION FOR JUDGMENT ON THE PLEADINGS DECLARING ALL
ASSERTED PATENT CLAIMS INVALID PURSUANT TO 35 U.S.C. § 101**

Defendants hereby file this notice to inform the Court of a recent decision relevant to Defendants’ Renewed Motion for Judgment on the Pleadings Declaring All Asserted Patent Claims Invalid Pursuant to 35 U.S.C. § 101 (Dkt. 539): *Kroy IP Holdings, LLC v. Safeway, Inc.*, Case No. 2:12-cv-800-WCB (May 29, 2015 E.D. Texas) (Bryson, J., sitting by designation) (rejecting argument that patents were valid because they relied on “specialized” computer hardware, where systems were “‘specialized’ only because they are dedicated to [a] specialized purpose . . .”) (attached as exhibit A). This decision invalidates patent claims analogous to the asserted claims of the patents-in-suit as drawn to unpatentable subject matter under 35 U.S.C. § 101.

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Dated: June 3, 2015

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a), and served on all counsel who have consented to electronic service on June 3, 2015.

By /s/ Robert Unikel